



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE
McLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wileyrein.com

March 2, 2009

Thomas J. Navin
202.719.7487
tnavin@wileyrein.com

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554

**Re: Inmate Telephone, Inc.; Filer ID No. 827478
Annual Section 64.2009(e) CPNI Certification
EB Docket No. 06-36**

Dear Ms. Dortch:

Enclosed on behalf of Inmate Telephone, Inc., is its annual Section 64.2009(e) CPNI certification and accompanying statement explaining the company's compliance procedures for the calendar year 2008. Since the due date for this certification (March 1, 2009) fell on a weekend this year, the filing is being submitted on the next business day, as permitted under Section 1.4(j) of the FCC's rules, 47 C.F.R. § 1.4(j) (2007).

Please let me know if you have any questions about this filing or need further information. I can be reached at 202.719.7487 (Telephone), 202.719.7027 (Facsimile), or tnavin@wileyrein.com.

Respectfully submitted,

/s/

Thomas J. Navin
Counsel to Inmate Telephone, Inc.

cc: FCC's Commercial Copy Contractor, Best Copy & Printing, Inc.
(via email at fcc@bcpiweb.com)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date due: March 1, 2009

Date filed: March 2, 2009 (next business day pursuant to FCC Rule, 47 C.F.R. § 1.4 (2007)).

Name of company covered by this certification: INMATE TELEPHONE, INC.

Form 499 Filer ID: 827478

Name of signatory: Anthony R. Bambocci

Title of signatory: President and Chief Executive Officer

I, Anthony R. Bambocci, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by the company at state commissions, in state or federal court, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

A handwritten signature in dark ink, appearing to read "Anthony R. Bambocci", is written over a horizontal line.

Statement Explaining Company Procedures

INMATE TELEPHONE, INC. ("ITI"), provides enhanced inmate telephony solutions to support the activities of the corrections industry by reselling the services of facilities-based providers. ITI has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.* These procedures include the following:

- ITI does not release customers' CPNI (either in-person, over the phone, or online) without first establishing that the person requesting the information is the subscriber whose CPNI is being requested or an authorized user.
- ITI continually educates its employees regarding the appropriate use of CPNI. ITI has established internal procedures designed to ensure that customers' CPNI is adequately protected and properly disclosed. These procedures are reviewed and updated as needed.
- In the event of an unauthorized disclosure of CPNI, ITI will notify the United States Secret Service, the Federal Bureau of Investigation, and the customer in a lawful and timely manner.
- ITI does not use CPNI in marketing. However, should ITI's practices change, the company will obtain opt-in consent from a customer before disclosing that customer's CPNI to any joint venture partners or independent contractors for the purpose of marketing communications-related services to that customer.